

Commonwealth of Kentucky
Division for Air Quality
RESPONSE TO COMMENTS

ON THE
Federally Enforceable Conditional Major Permit, No. F-02-023
United L-N Glass
102 Kuhlman Drive
Versailles, Kentucky 42420
January 15, 2004
Matt King
Plant I.D. # 21-239-00015
Application Log # 54796

SOURCE DESCRIPTION:

United L-N Glass manufactures automotive glass. Blanks are cut to size and laminated together to form the finished windows. United uses a silk-screen process to apply paint to the windows. The permit also authorizes the construction of a new paint station.

COMMENTS:

401 KAR 59:015 applies to the Heat Exchangers. 401 KAR 63:020 applies to the printing, cleaning, painting, assembling, and autoclaving operations.

A Screen3 modeling analysis was performed to ensure compliance with 401 KAR 63:020. Maximum ambient concentrations caused by the facilities emissions were below Preliminary Remedial Goals (PRG).

EMISSION AND OPERATING CAPS DESCRIPTION:

Individual HAP emissions shall not exceed 9 tons per year. Combined HAPs emissions shall not exceed 22.5 tons per year. VOC emissions shall not exceed 90 tons per year.

OPERATIONAL FLEXIBILITY:

Changes in the formulations of paints and cleaners shall not require a modification of this permit provided that such changes; a) maintain compliance with specific conditions of this permit, b) do not result in emissions in excess of those specified in general condition, and c) do not subject the permittee to additional requirements.

PUBLIC AND U.S. EPA REVIEW:

On December 11, 2003, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *The Woodford Sun* in Versailles, Kentucky. The public comment period expired 30 days from the date of publication.

No comments were received during this period. The permit is now being issued as a final permit.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements.

At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.